

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

AHMAD AL-SHAHMAN

No. 20 CR 362

Judge Jorge L. Alonso

**MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The superseding indictment in this case charges defendant with failing to file a tax return, in violation of Title 26, United States Code, Section 7203 (Count 1 - 2) and tax evasion, in violation of Title 26, United States Code, Section 7201 (Count 3).
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely the privacy interests of third parties.

3. The government has discussed the proposed protective order with counsel for defendant, who agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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